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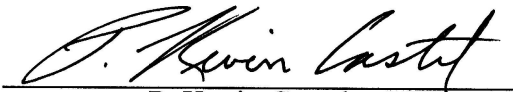
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October 14, 2022

Application for out-of-district travel on October 18 is GRANTED.
SO ORDERED.
10/17/22

BY ECF

The Honorable P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007


P. Kevin Castel
United States District Judge

Re: *United States v. Andrew Brown*, S1 20 Cr. 470 (PKC)

Dear Judge Castel:

We respectfully write on behalf of Andrew Brown to request that the restrictions on his travel be modified to allow him to travel to the Northern District of New York on October 18, 2022 and thereafter, without making a prior request of the Court, for the specific purpose of visiting his son at college in that District and, relatedly, driving his son between college and Mr. Brown's home from time to time. The reason we are making this request now is that Mr. Brown's son has begun attending college in Cortland, New York.¹

The Pretrial Services Officer supervising Mr. Brown consents to this request provided that Mr. Brown informs her of his travel plans, and verifies that he is traveling to his son's college when he does so. The Government has informed us that, provided Pretrial Services consents, it has no objection to Mr. Brown's proposed trip on October 18. The Government also states that, if Pretrial Services consents, it has no objection to the request for permission for Mr. Brown, without prior approval of the Court, to travel to the Northern District of New York for the purpose of visiting his son, as well as for the purpose of driving his son from the Browns' home back to college, if the need arises in the future.

¹ In August 2021, the Court denied a request from Mr. Brown for permission to travel to the Northern District of New York without making a prior request for each visit. *See* ECF 60. Our request now is limited to the newly arisen purpose of visiting his son and transporting him to and from college.

Hon. P. Kevin Castel

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Thank you for your consideration of this request.

Respectfully submitted,

/s

Max Nicholas
Reed M. Keefe
Attorneys for Andrew Brown

cc: All Counsel via ECF